

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

V.

MOHAMMED ALMUTTAN (1),

Defendants.

No. 4:17-CR0234 RLW/DDN

MOTION TO AMEND BOND CONDITIONS

Comes now the Defendant, Mohammed Almuttan (1), by and through his attorneys and respectfully request the Court to amend the bond conditions that have been entered in this matter. In support thereof, the Defendant states as follows:

1. The Defendant is being unnecessarily restricted in his movements for legitimate business purposes.
2. Pre-Trial Release does not understand the requirements of operating the Defendant's businesses. They have purposely frustrated the Defendant in his movements for legitimate business purposes.
3. The Defendant in this matter operates nine legitimate businesses in the City of St. Louis and in St. Louis County. Each of these businesses has legitimate mercantile requirements including: operating ATMs, making bank deposits, overseeing activities within the various business locations, and other business related activities. Due to sheer size and volume of the Defendant's businesses, there is a necessity for the

Defendant to move among the various businesses. This includes movement to banks and vendors, all in the legitimate exercise of their business.

Wherefore, the Defendant requests that the Court amend the conditions of his monitored release to allow him movement among his various stores and business entities, and for such other and further orders that the Court deems just in the premises.

BRUNTRAGER & BILLINGS, P.C.

/s/ Neil J. Bruntrager
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CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of July, 2017, the foregoing **Motion to Amend Bond Conditions** was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon all attorneys of record.

/s/ Neil J. Bruntrager